

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

COMPRESSOR ENGINEERING
CORPORATION, a Michigan corporation,
individually and as the representative of a
class of similarly situated persons,

Plaintiff,

v.

CHARLES J. THOMAS, JR.,

Defendant.

Case No. 2:10-cv-10059-PDB-VMM

Hon. Paul D. Borman

Mag. R. Steven Whalen

JASON J. THOMPSON (P47184)
Sommers Schwartz, P.C.
One Towne Sq., 17th Floor
Southfield, MI 48076
(248) 355-0300
jthompson@sommerspc.com
Co-Counsel for Plaintiff

BRIAN J. WANCA
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008
(847) 368-1500
bwanca@andersonwanca.com
Co-Counsel for Plaintiff

PHILLIP A. BOCK
Bock & Hatch, LLC
134 N. LaSalle St., Ste. 1000
Chicago, IL 60602
(312) 658-5500
phil@bockhatchllc.com
Co-Counsel for Plaintiff

DENISE L. MITCHAM (P33208)
Attorney for Defendant
Charles J. Thomas, Jr.
Conklin Benham, P.C.
30700 Telegraph Rd., Ste. 2580
Bingham Farms, MI 48025
(248) 593-2450
dmitcham@conklinbenham.com

GEORGE K. LANG
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008
(847) 368-1500
glang@andersonwanca.com
Co-Counsel for Plaintiff

DEFENDANT CHARLES J. THOMAS JR.'S OFFER OF JUDGMENT

NOW COMES Defendant, Charles J. Thomas Jr., by and through his attorneys Conklin Benham P.C., and pursuant to Fed. R. Civ. P. 68 hereby offers to allow entry of judgment in the amount of One Thousand Five Hundred Dollars (\$1,500.00), as well as an order enjoining Defendant from sending additional unsolicited facsimile advertisements in violation of the Telephone Consumer Protections Act, 47 USC §227. This Defendant further agrees to pay for Plaintiff's costs through the date of acceptance of this Offer of Judgment.

Pursuant to Fed. R. Civ. P. 68, this Offer of Judgment remains open for Plaintiff to accept for fourteen (14) days following service. Acceptance may be accomplished only through written notice.

Respectfully Submitted,

CONKLIN BENHAM, P.C.

BY: /S/Denise L. Mitcham (P33208)
Attorney for Defendant Charles J. Thomas Jr.
30700 Telegraph Rd., Ste. 2580
Bingham Farms, MI 48025
(248) 593-2450
dmitcham@conklinbenham.com

Dated: September 25, 2015

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

COMPRESSOR ENGINEERING
CORPORATION, a Michigan corporation,
individually and as the representative of a
class of similarly situated persons,

Plaintiff,

v.

CHARLES J. THOMAS, JR.,

Defendant.

Case No. 2:10-cv-10059-PDB-VMM
Hon. Paul D. Borman
Mag. R. Steven Whalen

JASON J. THOMPSON (P47184)
Sommers Schwartz, P.C.
One Towne Sq., 17th Floor
Southfield, MI 48076
(248) 355-0300
jthompson@sommerspc.com
Co-Counsel for Plaintiff

BRIAN J. WANCA
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008
(847) 368-1500
bwanca@andersonwanca.com
Co-Counsel for Plaintiff

PHILLIP A. BOCK
Bock & Hatch, LLC
134 N. LaSalle St., Ste. 1000
Chicago, IL 60602
(312) 658-5500
phil@bockhatchllc.com
Co-Counsel for Plaintiff

DENISE L. MITCHAM (P33208)
Attorney for Defendant
Charles J. Thomas, Jr.
Conklin Benham, P.C.
30700 Telegraph Rd., Ste. 2580
Bingham Farms, MI 48025
(248) 593-2450
dmitcham@conklinbenham.com

GEORGE K. LANG
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008
(847) 368-1500
glang@andersonwanca.com
Co-Counsel for Plaintiff

PROOF OF SERVICE

La'Tangalar Dugan, being first duly sworn, deposes and states on September 25, 2015 she served **Defendant Charles J. Thomas, Jr.'s Offer of Judgment** and this **Proof of Service** by CM/ECF mail to the following person(s):

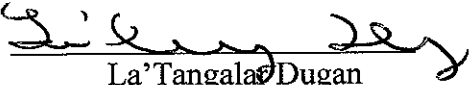
Ryan M. Kelly
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008

Jason J. Thompson
Sommers Schwartz, P.C.
One Towne Sq., 17th Floor
Southfield, MI 48076


Brian J. Wanca
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008

George K. Lang
Anderson + Wanca
3701 Algonquin Rd., Ste. 760
Rolling Meadows, IL 60008

Phillip A. Bock
Bock & Hatch, LLC
134 LaSalle St., Ste. 1000
Chicago, IL 60602


La'Tangalar Dugan

Subscribed and sworn to before me
on September 25, 2015.


Holly A. Schuler
Macomb County, MI
Acting In Oakland County, MI
My Commission Expires: 8-01-2018